

App. No. 10/727,276  
Amendment Dated: May 30, 2006  
Reply to Office Action of February 27, 2006

### REMARKS/ARGUMENTS

The Office Action mailed February 27, 2006 rejected pending claims 1-19 under 35 U.S.C. 103(a) as being unpatentable over Ayers ("AbiWord's Potential"), hereinafter referred to as "Ayers", in view of AbiWord Schema ([www.abisource.com/awml.xsd](http://www.abisource.com/awml.xsd)) hereinafter referred to as "AbiWord Schema." The Applicants respectfully disagree and present the following for consideration. Claims 1-3, 5, 9, 12 and 16-17 have been amended. No new matter has been added.

#### Claim Rejections

With regard to Claim 1, the Office Action states that "[b]oth a start tag and end tag are disclosed within the conversion of the word processor document taught by Ayers." The Applicants respectfully disagree. In order to help expedite the prosecution of this matter, the Applicants have amended independent Claims 1, 9 and 16 to further clarify the invention. As amended, Claim 1 recites "determining a start tag location for a non-structured feature; determining an end tag location for the non-structured feature; and placing a start tag at the start tag location; wherein the start tag is an empty tag that does not overlap other elements; and placing an end tag at the end tag location, wherein the end tag is an empty tag that does not overlap other elements; and wherein the start tag and the end tag span other tags while maintaining a well formed ML document."

In contrast, Ayers does not disclose that the start tag and the end tag are empty tags that do not overlap other elements. Further, Ayers does not disclose that "the start tag and the end tag

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span other tags while maintaining a well formed ML document." Ayers also does not disclose how to maintain a well formed ML document when a "start tag and the end tag span other tags." Ayers would create an ML document that is not well formed if a start tag spanned other tags. Claims 9 and 16 have been similarly amended, albeit differently, and are allowable for at least the same reasons.

With regard to Claim 2, the Office Action states that the "reference provides a means of identifying tags and validating the document utilizing a rich formatting, including styles, lists, sections, and data types." The Applicants respectfully disagree. Claim 2, as amended, recites "wherein the start tag and the end tag include an identifier attribute that associates the start tag and the end tag." The "identifier attribute" is not disclosed by Ayers. Ayers only discloses differently named tags. Claim 3, as amended recites that the identifier "attribute is set to a same value within the start tag and the end tag."

Claims 5, 12 and 17 have been amended to further clarify the invention. These amended claims are clearly distinguishable from Ayers.

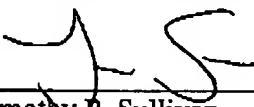
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Conclusion

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,

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